

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
CASE NUMBER 1:20CV66**

CARYN DEVINS STRICKLAND,)	
)	
Plaintiff,)	
)	
v.)	
)	
UNITED STATES OF AMERICA, et al.,)	
)	
<u>Defendants.</u>)	

CONSENT MOTION TO EXTEND THE REPLY BRIEF DEADLINES

Defendants hereby move the Court for a one-week extension of the summary judgment reply brief deadlines for both parties, from June 22 to June 29, 2023. Plaintiff does not oppose the relief requested herein.

BACKGROUND

1. On July 14, 2022, this Court set the deadline for Rule 56 motions as June 1, 2023.
2. On March 2, 2023, this Court entered a scheduling order in this case setting additional deadlines, but did not include a briefing schedule for summary judgment motions. ECF No. 187.
3. Under the local rules, both parties' summary judgment opposition briefs are due on June 15, 2023, and their reply briefs are due on June 22, 2023. *See* Local Civil Rule 7.1(e).

BASIS FOR EXTENSION REQUEST

4. Good cause supports this extension. Two attorneys for Defendants will be taking their respective parental leave beginning in June 2023 through the summer, one as of June 1 and the other by no later than June 25.

5. Of the two remaining counsel, the undersigned has pre-scheduled travel with her family the week the reply brief is due that she cannot move. She will return from her travel on June 25, 2023.
6. Accordingly, only one attorney for Defendants is currently expected to be available during the week the reply brief would be due. Moreover, it is anticipated that the summary judgment briefing will raise numerous issues and require addressing significant portions of the voluminous evidentiary record in this case. Thus, a significant amount of time will be necessary for Defendants' counsel to draft a comprehensive reply brief and have it reviewed internally within DOJ and by the client agencies.

ADDITIONAL INFORMATION

7. Granting this motion will not affect any other existing deadlines.
8. Pursuant to the Local Rules, the parties have met and conferred through counsel and Plaintiff does not oppose the relief requested in this motion. Defendants likewise consent to Plaintiff receiving a one-week extension for her own summary judgment reply brief.
9. For these reasons, Defendants request that the parties have two weeks, until June 29, 2023, to file summary judgment reply briefs.

Dated: May 18, 2023

Respectfully submitted,

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/s/ Danielle Young

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